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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Epic Games Inc. v. Google LLC et al., Case
No. 3:20-cv-05671-JD

*In re Google Play Consumer Antitrust
Litigation*, Case No. 3:20-cv-05761-JD

*In re Google Play Developer Antitrust
Litigation*, Case No. 3:20-cv-05792-JD

State of Utah et al. v. Google LLC et al., Case
No. 3:21-cv-05227-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF BRIAN C. ROCCA
IN SUPPORT OF STIPULATION AND
[PROPOSED] ORDER RE: DEADLINE
FOR GOOGLE'S RESPONSIVE
PLEADINGS TO COMPLAINTS**

Judge: Hon. James Donato

1 1. I am a partner at Morgan, Lewis & Bockius LLP, counsel of record for
2 Defendants Google LLC, Google Ireland Limited, Google Commerce Ltd., Google Payment
3 Corp., Google Asia Pacific Pte. Ltd., and Alphabet Inc. (“Defendants” or “Google”) in this
4 multi-district litigation (MDL). I am a member in good standing of the State Bar of California
5 and admitted to practice in the state and federal courts of California. I respectfully submit this
6 declaration pursuant to Local Rule 6-2(a) in support of Parties’ Stipulation and [Proposed] Order
7 Re: Deadline for Google’s Deadline For Google’s Responsive Pleadings to Complaints. I have
8 personal knowledge of the facts or circumstances set forth herein. If called upon as a witness in
9 this action, I could and would testify competently thereto.

10 2. On July 21, 2021, Epic Games, Inc., Developer Plaintiffs, and Consumer
11 Plaintiffs filed amended complaints against Google. MDL ECF No. 62-64.

12 3. On July 7, 2021, certain States filed a complaint against Google. Case No. 21-
13 cv-05227-JD, ECF No. 1. That case was related to the other actions in the MDL. Case No. 21-
14 cv-05227-JD, ECF Nos. 35, 37.

15 4. On August 13, 2021, Parties filed a joint case management statement proposing a
16 briefing schedule in which Google’s Motions to Dismiss all four complaints would be due on
17 September 8, 2021, Plaintiffs’ Oppositions would be due on October 15, 2021, and Google’s
18 Reply would be due on November 2, 2021. MDL ECF No. 77.

19 5. On August 17, 2021, the Court entered an order approving the Parties’ proposed
20 briefing schedule and setting the hearing on Google’s Motions to Dismiss for November 18,
21 2021. MDL ECF No. 78.

22 6. In lieu of moving to dismiss, Google has elected to file responsive pleadings to
23 the four complaints.

24 7. On September 7, 2021, I contacted counsel for Plaintiffs in each of the four
25 actions in the MDL to inform them of Google’s decision to file responsive pleadings to the
26 complaints. Each counsel confirmed that their clients would stipulate to October 11, 2021 as the
27 deadline for Google to file responsive pleadings to the complaints.

9. This is the first extension requested by Google regarding its responsive pleadings to any of the complaints in this MDL.

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DECLARATION OF BRIAN C. ROCCA ISO STIPULATION AND [PROPOSED] ORDER RE:
DEADLINE FOR GOOGLE'S RESPONSIVE PLEADINGS TO COMPLAINTS
Case Nos. 3:21-md-02981-JD; 3:20-cv-05671-JD; 3:20-cv-05761-JD; 3:20-cv-05792-JD; 3:21-cv-05227-JD